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May 9, 2017

By Electronic Filing

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: *Ex Parte Communication: WT Docket No. 10-119, RM-10762 and RM-10844*

Dear Ms. Dortch,

This letter is submitted pursuant to Section 1.1206(b)(2) of the FCC's rules by the American Society for Healthcare Engineering of the American Hospital Association ("ASHE") to request typographical and administrative corrections to the Part 95 rules incorporated in the draft released April 27, 2017, of the proposed Report and Order in the above-captioned proceedings. The corrections requested are as follows, with proposed additions underlined and proposed deletions in strike-out:

New Section 95.319(b) should be revised to state: "(b) *Internal repairs*. Internal adjustments and repairs to Personal Radio Services transmitters must be performed by or under the supervision of an individual who is qualified to maintain and repair transmitters in the private land mobile radio services (*see* § 90.433(c) of this chapter). This provision does not apply to WMTS and MedRadio transmitters authorized under Subparts H and I of this chapter."

New Section 95.325 should be revised to state: "Interference: Operators of Personal Radio Service stations experiencing or causing interference among themselves must first attempt to eliminate the interference by means of mutually satisfactory arrangements. If the operators are unable to resolve an interference problem, the FCC may impose restrictions including specifying the channels, maximum transmitting power, maximum antenna height and geographic area or hours of operation of the stations concerned." Without this clarification, the rule could be interpreted as requiring a Part 95 WMTS licensee to negotiate with an unlicensed user causing interference to WMTS systems.

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The heading of new Subsection 95.2309(g) should be revised to conform to its text and to the heading of pre-existing Section 95.1121 as follows: “Specific requirements for wireless medical telemetry devices operating in the 1395-1400 and 1427-~~1429.5~~ 1432 MHz bands.”

Please contact ASHE’s undersigned attorneys if you have any questions.

Sincerely,

/s/

Timothy J. Cooney

Patrick R. Halley